

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § § §	Case No. 22-33553 (Chapter 11) JUDGE CHRISTOPHER M. LOPEZ
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**DEBTOR'S MOTION FOR AN EXTENSION OF TIME TO FILE
SCHEDULES OF ASSETS AND LIABILITIES, SCHEDULES OF
EXECUTORY CONTRACTS, AND STATEMENTS OF FINANCIAL AFFAIRS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE:

Alexander E. Jones (the "Debtor"), files this *Debtor's Motion for an Extension of Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts, and Statements of Financial Affairs* (the "Motion") and in support thereof, respectfully represents as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

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II. BACKGROUND

2. On December 2, 2022 (the “Petition Date”), the Debtor filed his voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) commencing the above captioned case (the “Case”).

III. RELIEF REQUESTED

3. The Debtor seeks an extension of the period in which to complete and file his (1) schedules of assets and liabilities, (2) schedules of executory contracts, and (3) statements of financial affairs (collectively, the “Schedules and Statements”) as required by Bankruptcy Code § 521 and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Bankruptcy Rule 1007(c) provides for the extension, for cause, of the time for the filing of the Schedules and Statements. Fed. R. Bankr. P. 1007(c).

4. Because the Debtor made the final decision to commence this case shortly before filing his petition and did not have significant time to work on the Schedules and Statements prior to the Petition Date, the Debtor will be unable to complete his Schedules and Statements in the 14 days provided under Bankruptcy Rule 1007(c). Obtaining all necessary information will require the Debtor to expend considerable time and effort.

5. Furthermore, the Debtor is in the process of hiring a Financial Advisor to assist with the preparation of the Schedules and Statements to ensure their completeness and accuracy and it will take additional time to allow such Financial Advisor to gather, review, and analyze the Debtor’s financial information to perform these tasks.

6. While Debtor is working diligently with his Financial Advisor to prepare the Schedules and Statements, Debtor respectfully submits the importance of obtaining accurate Schedules and Statements in this Case justifies an extension of the deadline to file same and

constitutes “cause” pursuant to Fed. R. Bankr. P. 1007(c). Debtor anticipates that he will be able to file the Schedules and Statements, all in the appropriate formats prescribed by the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of this Court, 45 days after the Petition Date, January 16, 2023. The 341 meeting of creditors has yet to be scheduled.

FOR THE ABOVE REASONS, the Debtor respectfully requests that the Court enter an order (i) granting the Motion and (ii) granting such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED this 14th day of December, 2022.

CROWE & DUNLEVY, P.C.

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PROPOSED ATTORNEYS FOR DEBTOR ALEXANDER E. JONES

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CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned counsel conferred with counsel for the U.S. Trustee's Office on Monday, December 12, 2022 regarding the relief requested herein and the U.S. Trustee's Office is not opposed to the relief requested as set forth in the proposed order attached hereto.

/s/ Christina W. Stephenson

Christina W. Stephenson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties registered to receive notices via the Court's ECF noticing system, including the United States Trustee, on this 14th day of December, 2022.

/s/ Christina W. Stephenson

Christina W. Stephenson